

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

Kyle Fellers, Anthony Foote,
Nicole Foote, and Eldon Rash,

Plaintiffs,

v.

Marcy Kelley, Michael Desilets, Matt Fiske,
Bow School District, Phillip Lamy & Steve
Rossetti

Defendants.

Case No. 1:24-cv-311-SM-AJ

**NOTICE OF INTENT TO FILE OBJECTION TO PLAINTIFFS' EMERGENCY
MOTION FOR TEMPORARY RESTRAINING ORDER**

NOW COMES Defendant Bow School District, by and through its attorneys Cullen Collimore Shirley PLLC, and hereby gives notice of its intention to file an objection to Plaintiffs' Emergency Motion for Temporary Restraining Order, and states as follows:

1. Plaintiffs filed their Complaint on Monday, September 30, 2024, and served it later that evening.
2. Rather than file a motion for relief at that time, Plaintiffs waited until after 2:30 PM on the afternoon of Friday, October 4, to assert that they require "emergency" relief and that such relief must be granted no later than the early evening of Tuesday, October 8. By so doing, Plaintiffs have shaved four days off Defendants' ability to respond to their request and raise a serious question as to the "emergency" nature of their Motion.

3. Regardless, Defendant Bow School District intends to file an objection to Plaintiffs' request for emergency relief on Monday, October 7. The objection will necessarily be abbreviated given the shortened timeframe for responding.

4. Defendant will respond to the other aspect of Plaintiff's filing – the motion for a preliminary injunction – with a more fulsome objection in accordance with Court rules and orders.

Respectfully submitted,

BOW SCHOOL DISTRICT

By its attorneys,

CULLEN COLLIMORE SHIRLEY PLLC

Dated: October 4, 2024

/s/ Brian J.S. Cullen
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CERTIFICATE OF SERVICE

I certify that a copy of this filing was served via the Court's ECF filing system upon counsel of record.

Dated: October 4, 2024

/s/ Brian J.S. Cullen
Brian J.S. Cullen